

### **REMARKS/ARGUMENTS**

These Remarks are responsive to the Office Action mailed July 26, 2005 ("Final Office Action"). Applicants respectfully request reconsideration of the rejections of the pending claims for at least the following reasons.

The Examiner has rejected claim 151 under 35 U.S.C. § 112, 2<sup>nd</sup> para., as being indefinite for use of the terms "inward" and "outward." While applicants do not agree that these terms rendered claim 151 indefinite, in an effort to advance prosecution of the case, applicants have amended claim 151 to use the "center" and "edge" terminology suggested by the Examiner. Applicants respectfully submit that the rejection under 35 U.S.C. § 112, 2<sup>nd</sup> para., is obviated by the present amendment and request that it be withdrawn.

As acknowledged in the Office Action, claim 151 distinguishes over the prior art and is therefore allowable. See Office Action, para. 2. Applicants respectfully request notice that claim 151 is allowable in the next communication from the Examiner.

Independent claims 1 and 129 stand rejected under 35 U.S.C. § 103(a) as unpatentable over White in view of Sakamoto, Yaginuma or Nimmagadda. Applicants have amended claims 1 and 129 to emphasize that the applied DC voltage level is "below implantation level and above vapor deposition level." Applicants respectfully submit that none of the cited references, nor their proposed combination recite this claimed feature. Instead the cited references disclose systems that operate at energy levels above implantation level. Furthermore, Applicants respectfully submit that it would not have been obvious to modify the cited references to operate at the claimed DC voltage level because the prior art uses magnetic fields (see, e.g., White, items 78) that causes detrimental variation in the deposition thickness at the claimed voltage level. For at least these reasons, applicants respectfully submit that the asserted rejections of claims 1 and 129 are improper and request that they be withdrawn.

Dependent claims 2-5, 7, 8, 15-17, 24, 25, 27-28, 32-50, 52-57, 59-62, 67-68, 70-81, 85-88, 90-95, 98-103, 105, 111-114, 118-128 and 132 depend from one of claim 1 or 129 and, thus, contain the features recited in the independent claims. Therefore, applicants respectfully submit that the dependent claims are allowable for at least the

reasons given above with respect to claims 1 and 129. Applicants respectfully request that the rejections of the dependent claims be withdrawn.


**CONCLUSION**

In the event any variance exists between the amount authorized to be charge to the Deposit Account and the Patent Office charges, please charge or credit any difference to the undersigned's Deposit Account No. 50-0206.

Respectfully submitted,

HUNTON & WILLIAMS LLP

By:

 YISUN SONG  
Reg No. 44,487  
Christopher Cuneo  
Registration No 42,450

Dated: November 23, 2005

Hunton & Williams LLP  
Intellectual Property Department  
1900 K Street, N.W.  
Suite 1200  
Washington, DC 20006-1109  
(202) 955-1500 (telephone)  
(202) 778-2201 (facsimile)